

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Janice Travis

Debtor

)
) **Case No: 19 B 01961**
) **Judge: Cleary**
) **Chapter 13**
)

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

Trustee: Marilyn O. Marshall, 224 S. Michigan Ste. 800, Chicago, IL 60604

and served upon the following parties via U.S. Mail:

Debtor: Janice Travis, 359 Concord Dr, Chicago Heights, IL 60411

See Attached Service List

PLEASE TAKE NOTICE that on June 8, 2020 at 1:30 p.m.,

or as soon thereafter as I may be heard, I shall appear before the Honorable Judge Cleary, or any other Bankruptcy Judge presiding in his place in Courtroom 644 of the Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion to Modify Plan, and shall request that the attached Order be entered, at which time you may appear if so desired. If any party objects to the attached motion and request that the motion be called in Court, the party must file a Notice of objection no later than two business days before the presentment date of this motion.

PROOF OF SERVICE

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before May 18, 2020.

/s/ Angelica Harb
Angelica Harb
Hinds Law, LLC
211 W. Wacker Dr., Ste. 321
Chicago, IL 60606
800-695-7674

Label Matrix for local noticing
0752-1
Case 19-01961
Northern District of Illinois
Eastern Division
Mon Mar 9 18:23:52 CDT 2020

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Page 3 of 6

Auto Cap Ent
2 Northfield Pl
Winnetka, IL 60093-1294

Cab Serv
90 Barney Dr
Joliet, IL 60435-6402

(p)CAVALRY PORTFOLIO SERVICES LLC
500 SUMMIT LAKE DR
STE 400
VALHALLA NY 10595-2322

Comcast
P.O. Box 4200
Brownsville, TX 78523-4200

Credit Acceptance Corp
22505 W 12 Mile Rd Ste 3000
Southfield, MI 48034

Directv, LLC
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

ERC/Enhanced Recovery Corp
Attn: Bankruptcy
8014 Bayberry Road
Jacksonville, FL 32256-7412

Ffcc-Colombus Inc
1550 Old Henderson Rd St
Columbus, OH 43220-3626

Harris & Harris
111 W Jackson Blvd
Suite 400
Chicago, IL 60604-4135

JP Morgan Chase Bank
PO Box 182051
Columbus, OH 43218-2051

JP Morgan Chase Bank NA
P.O. Box 901032
Fort Worth, TX 76101-2032

JPMorgan Chase Bank, National Association
P.O. Box 29505 AZ1-1191
Phoenix, AZ 85038-9505

PLS Loan Store
1427 W 127th St
Calumet Park, IL 60827-6019

RJM Acquisitions LLC
575 Underhill Blvd Ste 224
Syosset, NY 11791-3416

Sprint
200 W Monroe St
Chicago, IL 60606-5137

Wells Fargo Bank, N.A. Trustee (See 410)
c/o Specialized Loan Servicing LLC
8742 Lucent Blvd, Suite 300
Highlands Ranch, Colorado 80129-2386

Wells Fargo Home Mortgage
Attn: Bankruptcy
Po Box 10335
Des Moines, IA 50306-0335

Angelica Harb
Hinds Law LLC
211 W Wacker Dr Suite 321
Chicago, IL 60606-1217

Angelica Harb
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606-1390

Janice Travis
359 Concord Dr
Chicago Heights, IL 60411-4034

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Cavalry Investments LLC
P.O. Box 27288
Tempe, AZ 85282

(d)Cavalry Portfolio Services LLC
P.O. Box 27288
Tempe, AZ 85282

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)JPMorgan Chase Bank, National Association

(u)Specialized Loan Servicing LLC

End of Label Matrix	
Mailable recipients	23
Bypassed recipients	2
Total	25

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE: Janice Travis

Debtor

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) **Case No: 19 B 01961**
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)

MOTION TO MODIFY PLAN

Now comes Janice Travis (hereinafter referred to as “Debtor”), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On January 23, 2019, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on April 22, 2019. The confirmed plan called for payments of \$280.00 for 36 months, paying unsecured creditors 100% on their claims.
3. The Debtor’s confirmed plan calls for the Trustee to pay JP Morgan Chase(Debtor’s lienholder) for her 2008 Ford Fusion. JP Morgan Chase filed a secured proof of claim on February 15, 2019 in the amount of \$2,703.05. Debtor’s 2008 Ford Fusion was involved in a total loss accident. This Court authorized State Farm to distribute insurance proceeds on March 9, 2020 to pay JP Morgan Chase in full to pay off their lien.
4. Debtor’s counsel spoke with representatives from JP Morgan Chase that stated they will only amend their proof of claim with an order from this Court. Debtor is

requesting that the Trustee stop any further payments to JP Morgan Chase as their claim has already been paid by Debtor's insurance.

WHEREFORE, Debtor prays that this Honorable Court enter an Order for the following relief:

1. That the Trustee cease any further payments to JP Morgan Chase; and
2. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

 /s/ Angelica Harb
Angelica M. Harb
Hinds Law, LLC
211 W. Wacker Dr., Ste. 321
Chicago, IL 60606
800-695-7674